

M E M O R A N D U M

July 25, 1980

TO: RICHARD M. FRY, Manager  
Field Operations Branch

THROUGH: ROSS SINGLETON, Environmental Supervisor  
Field Operations Branch

FROM: ROBERT KOENTOP, Environmental Specialist *RK*  
Field Operations Branch

SUBJECT: Ford Motor Company - A. L. Taylor Site *file*

Site: *A. L. Taylor*  
Break: *2, 2*  
Other: *[initials]*

*Handwritten notes:*  
Ford's clean-up/disposal operations at the Valley of the Drums.  
JUL 28 1980  
DIV. OF HAZARDOUS MATERIALS  
AND WASTE MANAGEMENT

On July 21, 1980, I met with Mr. Jim Carrico (Engineering Supervisor) and Mr. Sam Horton (Designated Environmental Control Engineer) to further Ford's clean-up/disposal operations at the Valley of the Drums.

NOTE: This was the first day back by Ford personnel from their two (2) week mandatory vacation leave.

Mr. Carrico requested a "where we stand and where do we go from here" report regarding the operations at the Valley. I informed him of the following:

1. 560 gallons of waste oil was sent to Kyana Waste Oil - Louisville, Kentucky.
2. Approximately 6000 gallons of liquid waste solvent has been batched and analyzed. Since the analysis showed no halogenated hydrocarbons present, a variety of facilities (in state and out of state) could be utilized for incineration of the solvent waste. At present, the material is being stored on site in holding tanks.
3. 184 drums containing solvent-pumped residues should be considered hazardous (as opposed to testing for a non-hazardous/hazardous designation). These residues are solvent saturated (solvent batch had a F.P. = 11°C) and therefore would be characteristic of a flammable/ignitable material. Additionally, these residues could be suspected as hazardous via lead and chromium contamination (solvent batch had Cr = 3.68 ppm and Pb = 58.47 ppm). Ford agreed with the probability of the material being hazardous.
4. Drums designated as empty by Ford, must meet Departmental requirements for an empty drum. However, since an empty drum has yet to be defined by our Department, this remains a "gray area".

NOTE: Mr. Blair had informed me that every drum to be declared empty (by Ford) must be triple rinsed or have some residue in that "empty drum" analyzed. The feasibility of this request (to work in the field) has been questioned by the Ford Motor Company.

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5. Contents of oil residue drums must also be analyzed - even though the waste oil itself contained no PCB contamination and was hauled off site to a recycler. Ford had indicated that because the waste oil was determined non-hazardous, the oil residue should also be declared non-hazardous.
6. Drums containing materials (identified by Ford personnel) that are presently being landfilled, within Kentucky, via Divisional special permission (i.e. sealers and adhesives) may be segregated and disposed at these corresponding landfills.
7. All remaining solids and sludges must be analyzed for determination of their non-hazardous/hazardous designation.

Mr. Carrico agreed to actively pursue the completion of items 2 and 6. However, due to Fords' basic disagreements regarding the remaining items, additional corporate policy must be procured before decisions concerning items 3,4,5 and 7 can be finalized.

NOTE: The main question that arose from our meeting was the definition of an empty drum.

RK/lrw

cc: Caroline P. Haight  
Art Curtis